

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

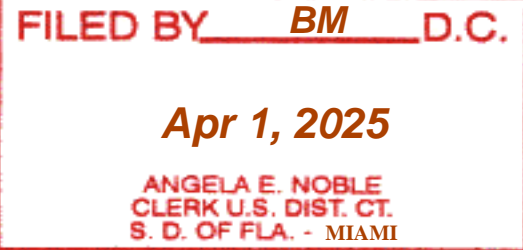
CASE NO. 25-20059-CR-ALTONAGA/REID(s)(s)
18 U.S.C. § 1001(a)(2)

UNITED STATES OF AMERICA

vs.

CHENGZHE WANG,

Defendant.



SECOND SUPERSEDING INDICTMENT

The Grand Jury charges that:

COUNT 1
Material False Statement to Government Agency
(18 U.S.C. § 1001(a)(2))

From on or about January 14, 2025, through on or about January 15, 2025, at the Miami International Airport, in Miami-Dade County, in the Southern District of Florida, in a manner within the jurisdiction of the United States Customs and Border Protection, an agency of the executive branch of the United States Government, the defendant,

CHENGZHE WANG,

did knowingly and willfully make a false, fictitious, and fraudulent statement and representation as to a material fact, in that, he falsely represented that his employer is a privately-owned company with no ties to the Chinese government; he was no longer a member of the Communist Youth League of China; and that his 2023 trip from Seoul, South Korea, to Dallas, Texas, was for vacation and to visit a friend, when, in truth and in fact, as the defendant knew, his employer is at least partly owned by the Chinese government; he is still an active member of the Communist Youth League of China; and his 2023

trip from Seoul, South Korea, to Dallas, Texas, was for the purpose of attending business meetings in Houston, Texas, in violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL



FOREPERSON

A handwritten signature in blue ink, appearing to read "H. P. O'Byrne", followed by "for:".

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

A handwritten signature in blue ink, appearing to read "Ajay J. Alexander", followed by "for:".

AJAY J. ALEXANDER
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES OF AMERICA

CASE NO.: 25-20059-CR-Altonaga/Reid (s)(s)

v.

CHENGZHE WANG,

CERTIFICATE OF TRIAL ATTORNEY

Defendant.

Court Division (select one)

- ☒ Miami ☐ Key West ☐ FTP
☐ FTL ☐ WPB

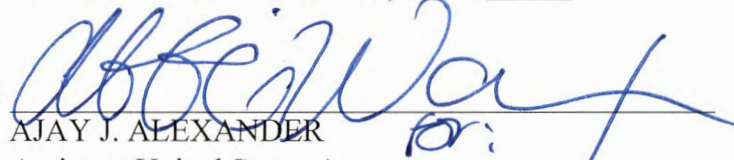
Superseding Case Information:

New Defendant(s) (Yes or No) No
Number of New Defendants 0
Total number of new counts 0

I do hereby certify that:

1. I have carefully considered the allegations of the Indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, 28 U.S.C. §3161.
3. Interpreter: (Yes or No) Yes
List language and/or dialect: Mandarin
4. This case will take 2 days for the parties to try.
5. Please check appropriate category and type of offense listed below:
(Check only one) (Check only one)
I ☒ 0 to 5 days ☐ Petty
II ☐ 6 to 10 days ☐ Minor
III ☐ 11 to 20 days ☐ Misdemeanor
IV ☐ 21 to 60 days ☒ Felony
V ☐ 61 days and over
6. Has this case been previously filed in this District Court? (Yes or No) No
If yes, Judge _____ Case No. _____
7. Has a complaint been filed in this matter? (Yes or No) Yes
If yes, Judge Jonathan Goodman Magistrate Case No. 25-MJ-02093
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No
If yes, Judge _____ Case No. _____
9. Defendant(s) in federal custody as of January 15, 2025
10. Defendant(s) in state custody as of _____
11. Rule 20 from the _____ District of _____
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? (Yes or No) No
14. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
15. Did this matter involve the participation of or consultation with Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No
16. Did this matter involve the participation of or consultation with Magistrate Judge Ellen F. D'Angelo during her tenure at the U.S. Attorney's Office, which concluded on October 7, 2024? No

By:


AJAY J. ALEXANDER
Assistant United States Attorney
SDFL Court ID No. A5502506

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: CHENGZHE WANG

Case No: 25-20059-CR-ALTONAGA(s)(s)

Count 1

Material False Statement to Government Agency

Title 18, United States Code, Section 1001(a)(2)

* **Max. Term of Imprisonment:** 5 years

* **Mandatory Min. Term of Imprisonment (if applicable):** N/A

* **Max. Supervised Release:** 1 year

* **Max. Fine:** \$250,000

*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.